Remarks

In the application, claims 1 through 3, 6 through 25, 28, 29, 38 through 41 are currently pending. No claims have been allowed.

The Final Office Action dated May 11, 2007, has been carefully considered. The Final Office Action rejects claims 1, 25, 28, and 31 under 35 U.S.C. § 101 as directed toward non-statutory subject matter. Claims 1 through 5, 7, 8, 10 through 13, 15, 16, 20, 23, 24, 28 through 34, 36, and 37 are rejected under 35 U.S.C. § 102 as anticipated by U.S. Patent 4,645,459 ("Graf"). Claims 25 and 27 are rejected as anticipated by U.S. Published Patent Application US 2003/0059743 A1 ("Lechner"). Claims 6, 9, 17 through 19, 21, and 22 are rejected under 35 U.S.C. § 103(a) as obvious in light of Graf and U.S. Patent 6,146,143 ("Huston"). Claims 14 and 35 are rejected as obvious in light of Graf. Finally, claim 26 is rejected as obvious in light of Lechner.

§ 101 Rejection

Claims 1 is amended so that its method stores the template database on a "computer-readable medium." This medium is a tangible, physical object on which the template database is embodied. The medium may be, for example, a compact disc, a DVD, computer RAM, or hard drive, but may also include paper or other surface or media from which a computer can read data. Claim 1, as amended, produces a tangible, physical object and is, therefore, patentable subject matter.

Claims 25 and 28 are amended in a similar manner so that they produce tangible, physical objects. Claim 31 is cancelled rendering its rejection moot.

The Applicants thus request that the § 101 rejection be withdrawn.

§§ 102, 103 Rejections

Claim 1 is amended to clarify particular features of one embodiment of the Applicants' claimed methods. In claim 1, a geographic database that represents a region of the real world is used as input. Using the input database, at least one parameter is calculated that represents a geographic aspect of a locale represented by the input database. A new database, called the

"template" database, is then created to represent an imaginary region, but a region in keeping with the calculated parameter. (This makes the imaginary region more realistic.) This method is discussed in the specification at, for example, paragraphs **[0031]** through **[0051]** (page 7, line 24 through page 10, line 29) and is shown in Figure 3.

While the cited art shows both real-world and imaginary-world databases, nowhere does the cited art discuss modifying a real-world database to create an imaginary-world database. In particular, the cited art neither teaches nor implies the following elements of claim 1, as currently amended:

> *calculating at least one parameter that characterizes a geographic aspect of the real-world region*, the calculating based, at least in part, on the provided set of data;
>
> forming a template database using the set of data from the source database, wherein the template database represents an imaginary geographic locale, and *wherein a geographic aspect of the imaginary locale is consistent with the calculated parameter* . . . .

(Emphasis added.) Therefore independent claim 1 and its dependent claims (2, 3, and 6 through 24) are neither anticipated by, nor rendered obvious in light of, the cited art. Claim 29, as currently amended, is a Beauregard version of claim 1 and is patentable for at least the same reasons as given above for claim 1.

Claims 25 and 28 are amended to clarify the source of the template database. As amended, they are patentable for at least the same reasons as given above for claim 1.

The Applicants request that the §§ 102, 103 rejections be withdrawn.

New Claims

The new independent claim 38 and its dependent claims 39 and 40 are supported by, for example, paragraph **[0052]** of the specification (page 10, lines 10-20). New claim 41 is a Beauregard version of claim 38. No new matter is introduced by these claims.

Claim 38 represents another method for creating an imaginary-world database from a real-world database. Nothing in the cited art teaches or suggests the following elements of the new claim 38:

> *transforming at least some of the provided set of data;*
>
> *insuring data integrity in the transformed data;*
>
> forming a template database using, at least in part, the transformed data,
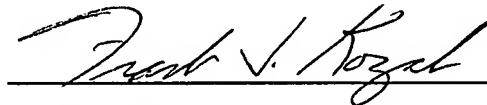>
> wherein the template database represents an imaginary geographic locale; . . . .

(Emphasis added.) Thus, new claims 38 through 41 are patentable over the cited art, and the Examiner is requested to allow these claims also.

Conclusion

The cited art neither anticipates nor renders obvious the currently pending claims. Thus, this application is considered to be in good and proper form for allowance, and the Applicants request that the Examiner withdraw the rejections and pass this application on to issue. If, in the opinion of the Examiner, a telephone conference would expedite the prosecution of this application, the Examiner is invited to call the Applicants' representative at the number given below.

Respectfully submitted,

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